

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JUAN JOHNSON,)	
)	
Plaintiff,)	05 C 1042
)	
v.)	Judge Grady
)	
REYNALDO GUEVARA, and the)	
CITY OF CHICAGO,)	
)	
Defendants.)	

PLAINTIFF'S MOTION IN LIMINE NO. 1
TO BAR ALL REFERENCES TO ANY CRIMINAL CONVICTIONS

NOW COMES Plaintiff, JUAN JOHNSON, by his counsel, and respectfully brings the following motion *in limine*.

Discussion

Some of the witnesses who will testify at this trial have felony convictions. The Federal Rules are very clear about the admissibility of evidence concerning prior convictions. Most important, they may not be more than ten years old. See Fed. R. Evid. 609(b).

Plaintiff is not aware of any conviction in the case that is less than ten years old. During discovery, Plaintiff served an Interrogatory on Defendant Guevara seeking disclosure of any qualifying conviction, and Guevara's only response was that his investigation is continuing. See Exhibit A. Discovery has now closed, without any supplementation. All prior convictions should be barred.

WHEREFORE, Defendants should be barred from introducing any witnesses' prior convictions at trial.

RESPECTFULLY SUBMITTED,


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